

The Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IRON PASHA, INC.,  
Plaintiff,

v.

SHANGHAI GRAND CHINA SHIPPING  
DEVELOPMENT CO., LTD., et al.,  
Defendants

Case No. C12-0621JLR

VERIFIED ANSWER OF GARNISHEE  
HAINAN AIRLINES COMPANY  
LIMITED TO "SECOND AMENDED  
PROCESS OF MARITIME  
ATTACHMENT AND GARNISHMENT"

Garnishee Hainan Airlines Company Limited ("Garnishee") believes and asserts that it has in its hands in this jurisdiction no debts, credits or effects of any of the Defendants. Garnishee anticipates filing a motion challenging the Second Amended Process of Maritime Attachment and Garnishment, as contemplated by the Court's Order of May 23, 2013. Garnishee believes and asserts that Plaintiff has proceeded as to Garnishee in this matter without sufficient process, without sufficient service of process, without subject matter jurisdiction and in an improper forum, and that directions affecting Garnishee were obtained improperly and in violation of due process. Garnishee reserves all other defenses and claims it may have in this matter.

1 DATED this 25 day of June, 2013.

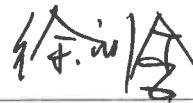
2 BAETZ / LAMKA / CLARK LLP  
3 1500 Two Union Square  
4 601 Union Street  
5 Seattle, Wa. 98101  
6 206 973-1610

7 Attorneys for Hainan Airlines Company Limited

8 By /s/ Hall Baetz  
9 WSBA #456

10 I verify under penalty of perjury under the laws of the United States of America that the  
11 foregoing is true and correct.

12 Executed on 25, June 2013.

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15 Xu Zhoujin, Chief Financial Officer  
16 Hainan Airlines Company Limited  
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